

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
COURTNEY E. ROBINSON	:	
DEBTOR	:	
	:	BANKR. NO. 18-15085-AMC

**STIPULATION TO APPROVE SETTLEMENT OF DEBTOR'S PERSONAL INJURY
CLAIM AND COMPENSATION TO PERSONAL INJURY ATTORNEY**

This STIPULATION TO APPROVE SETTLEMENT OF DEBTOR'S PERSONAL INJURY CLAIM AND COMPENSATION TO PERSONAL INJURY ATTORNEY ("Stipulation") is entered into by and between Courtney E. Robinson, (the "Debtor"), by his attorney, Brandon Perloff, Esquire; Scott F. Waterman, Esquire, the Chapter 13 Standing Trustee; and David Fine, on behalf of Fine and Staud, LLC (hereinafter, "Fine"), Debtor's personal injury attorney (collectively, the "Parties"). The Parties agree as follows:

WHEREAS, on or about 8/1/2018, the Debtor filed a Chapter 13 Bankruptcy seeking relief under Title 11;

WHEREAS, Scott F. Waterman Esquire (the "Trustee") was appointed the Chapter 13 Standing Trustee in this case;

WHEREAS David Fine, Esquire, of Fine and Staud, LLC (hereinafter, "Fine"), is an attorney specialized in personal injury law;

WHEREAS, on or about 10/8/2022, the Debtor was involved in a motor vehicle accident (hereinafter, "Accident") which resulted in bodily injuries;

WHEREAS, Debtor chose Fine to represent him in his claim for compensation related to said bodily injuries and has sought approval of his employment. (See Application to Employ, filed 6/15/2023, doc #108);

WHEREAS, Fine was able to solicit an offer of settlement for \$15,000.00 (“Settlement”), the policy limit under Debtor’s first-party uninsured motorist coverage (“UM Insurance”).¹

WHEREAS, after a diligent investigation, no other insurance or source of funds (besides UM Insurance) is available to the Debtor as payment for his bodily injury.

WHEREAS, the date of Debtor’s final payment under his Chapter 13 Plan is 8/1/2023.

WHEREAS, the Parties wish to avoid delay of Debtor’s receipt of the Settlement so that he may pay off the remaining Chapter 13 base amount;

NOW THEREFORE, the undersigned Parties agree and stipulate as follows:

1. The Settlement is a payment for personal bodily injuries of the debtor.
2. The Settlement is property that is fully exempt under the 11 U.S.C. §522(d)11(D), and debtor has properly asserted said exemption.
3. Pursuant to the contingent fee agreement between Fine and Debtor, Fine shall be allowed to recover 35% of the gross recovery plus reimbursement of all investigation, litigation, and other costs and expenses from the recovery after the fee is paid.
4. Additionally, Fine shall be able to negotiate and pay, from the Settlement all medical liens.
5. The remainder of the Settlement funds shall be paid to the Debtor.

¹ Trustee has been provided a copy of Debtor’s Auto insurance Declarations page.

6. The Parties agree that a facsimile signature shall be considered and original signature.

Dated: 6/30/2023

/s/ Brandon Perloff

Brandon Perloff, Esquire
Attorney for Debtor
(Bankruptcy Counsel)

Date: 6/30/2023

/s/ David W. Fine

David W. Fine, Esq.
FINE and STAUD LLC
1333 Race Street
Philadelphia, PA 19107
215-665-0100
(f) 267-710-7008

Date: 6/29/2023

/s/ Ann E. Swartz

Ann E. Swartz, Esquire
On behalf of Scott F. Waterman, Esquire
Standing Chapter 13 Trustee - Reading
2901 St. Lawrence Avenue
Suite 100
Reading, PA 19606

For the Court:



ASHELY M. CHAN
U.S. Bankruptcy Judge

Date: July 7, 2023